

EBASCO

June 21, 1991
RFEV21-EDEN-EGRF-M-038

EG & G Rocky Flats, Inc.
Rocky Flats Plant
P.O. Box 464
Golden, CO 80402-0464

Attention: Ms. Cindy Gee

Subject: Impact of Drilling Delays on Phase III 881 Hillside Remedial Investigation Deliverables

Dear Cindy:

Last week, on 6/11, I talked with Bill Moore (EG&G/NEPA) and Trisha Powell (DOE/NEPA) and asked them whether they had any new information on how long drilling activities at the 881 Hillside would be delayed. I learned that the categorical exclusion package had been reviewed by DOE/NEPA and returned to EG&G/NEPA for minor revisions. It would then go back to DOE/NEPA at Rocky Flats for signature and after that, be forwarded to DOE headquarters in Washington, D.C. for final approval. The package was due to leave Colorado late last week or early this week and, assuming no further revisions are required, approval from DOE headquarters would require a minimum of 3 weeks.

Comparing the above turnaround time with our proposed OU1 RI schedule leads us to conclude that drilling will be delayed until at least July 15. Although there are numerous activities that will keep us busy until then (such as finalizing the contract and revised scope of work, establishing a fully functional base for field operations, initiating Task 5 data analysis activities, and continuing with Task 6 public health evaluation and environmental evaluation work), I would like to draw your attention to some of the potentially troublesome impacts of the July 15 startup date. These are discussed briefly below.

1. A third rig and additional field personnel will be required to compensate for the late start. We have already discussed the possibility for this, but now it will be a necessity.
2. Even with the third rig, availability of appropriate personnel, and no operational or weather-induced delays, we estimate that it will take approximately 5 months to complete drilling and sampling of boreholes, drilling and installation of monitoring wells and piezometers, well completion activities, packer tests, and single and multi well pumping and tracer tests. This best case scenario suggests that field work may be completed by mid-December at the earliest.

ADMIN RECORD

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3. According to the EBASCO contract to provide analytical services under GRRASP, the period allocated to Quantalex for data validation is 90 days. Data validated by Quantalex will then be incorporated into RFEDS before they can officially be released to the Ebasco Team. Although the data submittal-validation-release process will be staggered throughout the field season, we will not be able to acquire a completely validated Phase III RI database until mid-March 1992. This poses a serious problem for completion of the RI report by the work order deadline of June 2, 1992, because the report is required to integrate the findings of all three phases of RI work at OU1.

Upon examining these facts we conclude that it will be very difficult to efficiently prepare a litigation-quality RI document, including human health and ecological risk assessments between the middle of March and June 2, 1992. It is imperative that we develop a strategy to overcome these major obstacles to work progress so that we can lessen the potentially negative impacts on product quality, schedule and budget. Several actions can be taken to help in this regard:

1. Accelerate the NEPA process,
2. Extend the length of each workday and work week during the field program,
3. Expedite data validation,
4. Reduce EG&G/DOE review time and EBASCO comment-response time for the first draft RI report delivery, and
5. Investigate whether the IAG draft RI deadline can be delayed.

Please note that Items 2, 3, and 4 can be implemented only by EG&G action. We assume that everything humanly possible is already being done with regard to Item 1 and we realize that action on Item 5 may not be acceptable.

After you have considered these matters further, please let us know how we can work together to deal with these issues.

Sincerely,
EBASCO SERVICES INCORPORATED

Hannah Pavlik

Hannah Pavlik, Ph.D.
Work Order Manager

HP/llh

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